

## **REMARKS**

Applicants reply to the Office Action dated September 13, 2006, along with a one (1) month extension of time request. Claims 1-11 are pending in this application and the Examiner rejects claims 1-11. Reconsideration of this application is respectfully requested.

### **Rejection under 35 U.S.C. § 102(b)**

The Examiner rejects claims 1-6 and 8-11 under 35 U.S.C. § 102(b) as being anticipated by Coleman, U.S. Patent 5,708,828 ("Coleman"). Applicant respectfully traverses this rejection.

To support the assertion that Coleman discloses employing a single translation to directly convert data of a first data type to data of a second data type, the Examiner directs Applicant to column 10, lines 30-33 of Coleman that discloses, "[i]t is noted that the creation of intermediate environments is optional depending upon the user's application" (emphasis added). However, Applicants respectfully assert that the Examiner has erroneously interpreted the "intermediate environment" of Coleman as serving a role in the translation process when, in fact, it does not. Applicants will demonstrate that the "intermediate environment" and the "pre-defined generic data type" as disclosed by Coleman, serve two entirely different purposes. Applicants will further demonstrate Coleman's reliance on a two-step translation process, and that removal of the translation from a first data type to the "pre-defined generic data type" would indeed render the Coleman system inoperable.

Coleman discloses a data translation process, which begins with creating what is termed an "environment," and extends to rendering and storing translated data. The environment is disclosed as being a combination of definitions and rules that are used to translate the data from the first format to a second generic format; and from the second generic format to a third format. According to Coleman, an environment can be created based on the specific data translation needs. For example, if a user needs to move data from a source Microsoft SQL Server database to a destination UNIX data file, the user may interface with the Coleman system to define the source and the destination. On the source side, this may require the user to create a pointer to the database, define which fields in the database need to be converted, and specify the data type for each field. On the destination side, the user may create a pointer to where the data file exists, specify how the data is to be formatted, and define the data type. When the definitions have been created and saved to memory, Coleman refers to the definitions as a data mapping object.

Coleman further discloses an "intermediate output environment" (not to be mistaken with the "environment" described above) as follows:

“Intermediate output environments are used for a variety of reasons including, first, to simplify the migration process itself by separating the process into smaller, more workable parts; second, to move a single store of imported data to multiple data base output files or even multiple different data base platforms; and third, to parse records into different output files for loading into separate databases...” (column 3, lines 46-53).

Thus, the intermediate output environment is optionally used to pre-process data from a first data environment to simplify complex migration tasks. In other words, implementation of an intermediate output environment is not related to, nor does it negate the need for multiple translation steps. See, for example, Fig. 3 that discloses at step 201 receiving definition of any desired intermediate formats. Much later in the process (*i.e.*, step 214), a migration takes place, wherein there is a conversion of data from a first input data environment to data having a pre-defined generic data type. Finally, in step 216, there is an execution of associations to convert data in the pre-defined generic data type to produce “output data” in accordance with a second data format.

As further evidence of the separation between the “intermediate output environment” and the “pre-defined generic data type; Coleman discloses the following:

“Intermediate output environments behave identically to normal output environments, and the process used to declare or create an intermediate output environment is identical to the process used to create input or output environments described above” (column 3, lines 53-57).

Thus, it is clear that the intermediate output environment, as disclosed by Coleman, can be most closely compared to the output environment, and that it is processed in the same manner as a normal input environment. That is, an intermediate output environment is created by converting data from an input data environment to a pre-defined generic data type (first translation), and is then converted from the pre-defined generic data type to a format suitable for the output data environment (second conversion). As such, Coleman does not disclose or suggest at least, “translating, via said host computer, using only a single translation of said data from said first source to a second source according to said definitions contained in said interface file,” as recited by independent claim 1.

Claims 2-6 and 8-11 variously depend from independent claim 1. As such, dependent claims 2-6 and 8-11 are differentiated from the cited reference for at least the reasons set forth above, as well as in view of their own respective features.

The Examiner rejects claim 7 under 35 U.S.C. § 103(a) as being unpatentable over Coleman in view of Free On-Line Dictionary of Computing definition of the term "wizard" ("Foldoc"). Applicant respectfully traverses this rejection.

Neither Coleman, Foldoc, nor any combination thereof, disclose or suggest at least, "translating, via said host computer, using only a single translation of said data from said first source to a second source according to said definitions contained in said interface file," as recited by independent claim 1 from which claim 7 depends. Thus, claim 7 is differentiated from the cited references for at least the same reasons as set forth above, as well as in view of its own respective features.

In view of the above remarks, Applicants respectfully submit that all pending claims properly set forth that which Applicants regard as their invention and are allowable over the cited references. Accordingly, Applicants respectfully request allowance of the pending claims. The Examiner is invited to telephone the undersigned at the Examiner's convenience, if that would help further prosecution of the subject application. Applicants authorize and respectfully request that any fees due be charged to Deposit Account No. 19-2814.

Respectfully submitted,

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